

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER PARTNERS II LLC,

*Plaintiff and Counterclaim-Defendant,*

v.

CELLCO PARTNERSHIP, D/B/A VERIZON  
WIRELESS, AND VERIZON CORPORATE  
SERVICES GROUP INC.,

*Defendants and Counterclaimant-Plaintiffs.*

Case No. 2:24-cv-00007-JRG-RSP

**JURY DEMANDED**

**JOINT MOTION FOR ENTRY OF AGREED  
DOCKET CONTROL ORDER**

Plaintiff Headwater Partners II LLC (“Headwater”) and Defendants Cellco Partnership, d/b/a Verizon Wireless, and Verizon Corporate Services Group Inc. (collectively, “Verizon” or “Defendants”) (all together, the “Parties”), hereby jointly request that the Court enter the proposed Docket Control Order, attached hereto as Exhibit A, to align pre-trial deadlines in the case schedules between *Headwater Partners II LLC v. Cellco Partnership, D/B/A Verizon Wireless, and Verizon Corporate Services Group Inc.*, Case No. 2:24-cv-00007-JRG-RSP, *Headwater Partners II LLC v. T-Mobile USA, Inc. and Sprint LLC*, Case No. 2:24-cv-00015-JRG-RSP, *Headwater Partners II LLC v. AT&T Services, Inc., AT&T Mobility, LLC and AT&T Corp.*, Case No. 2:24-cv-00016-JRG-RSP.

Dated: April 8, 2024

/s/ Jacob K. Baron

Jacob K. Baron, Esq.  
MA Bar No.: 652568  
Email: jacob.baron@hklaw.com  
Joshua C. Krumholz, Esq.  
(LEAD COUNSEL)  
(Pro hac vice)  
MA Bar No.: 552573  
Email: joshua.krumholz@hklaw.com  
Jacob W. S. Schneider, Esq.  
(Pro hac vice)  
MA Bar No.: 675315  
Email: jacob.schneider@hklaw.com  
Allison M. Lucier, Esq.  
(Pro hac vice)  
MA Bar No.: 569193  
Email: allison.lucier@hklaw.com  
**HOLLAND & KNIGHT LLP**  
10 Saint James Avenue; 11th Floor  
Boston, MA 02116  
Telephone: 617-523-2700  
Facsimile: 617-523-6850

Deron R. Dacus  
Texas Bar No. 00790553  
E-mail: ddacus@dacusfirm.com  
**THE DACUS FIRM, P.C.**  
821 ESE Loop 323, Suite 430  
Tyler, Texas 75701  
903-705-1117 (phone)  
903-581-2543 (fax)

*Attorneys for Defendants*

/s/ Marc Fenster

Marc Fenster  
CA State Bar No. 181067  
Email: mfenster@raklaw.com  
Reza Mirzaie  
CA State Bar No. 246953  
Email: rmirzaie@raklaw.com  
Brian Ledahl  
CA State Bar No. 186579  
Email: bledahl@raklaw.com  
Ben Wang  
CA State Bar No. 228712  
Email: bwang@raklaw.com  
Dale Chang  
CA State Bar No. 248657  
Email: dchang@raklaw.com  
Paul Kroeger  
CA State Bar No. 229074  
Email: pkroeger@raklaw.com  
Neil A. Rubin  
CA State Bar No. 250761  
Email: nrubin@raklaw.com  
Kristopher Davis  
CA State Bar No. 329627  
Email: kdavis@raklaw.com  
James S. Tsuei  
CA State Bar No. 285530  
Email: jtsuei@raklaw.com  
Philip Wang  
CA State Bar No. 262239  
Email: pwang@raklaw.com  
Amy Hayden  
CA State Bar No. 287026  
Email: ahayden@raklaw.com  
Jason M. Wietholter  
CA State Bar No. 337139  
Email: jwietholter@raklaw.com  
**RUSS AUGUST & KABAT**  
12424 Wilshire Blvd. 12th Floor  
Los Angeles, CA 90025  
Telephone: 310-826-7474

*Attorneys for Plaintiff*  
Headwater Partners II LLC

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this April 8, 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster